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February 15, 2023

Via ECF

Hon. Lee G. Dunst, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Agudelo v. Recovco Mortgage Management LLC et al.*, No. 22 Civ. 4004
Update to the Court

Dear Judge Dunst:

The parties write pursuant to Your Honor's February 1, 2023, direction to provide an update to the Court by today's date. The parties have continued to engage in vigorous settlement negotiations, including by phone this afternoon, and have made some progress toward reaching an agreement in principle. We request to continue negotiations through the end of this week and to provide a status update to the Court on Tuesday, February 21, 2023.

Respectfully submitted,

/s/ Scott Simpson

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cc: All counsel (by ECF)